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9  
10 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

11 FRANK COHN, Individually and on behalf of a )  
12 class of all similarly situated persons, )

13 Plaintiff, )

14 v. )

15 RITZ TRANSPORTATION, INC., AWG )  
16 AMBASSADOR, LLC, ALAN WAXLER, and )  
RAYMOND CHENOWETH, )

17 )  
18 Defendants. )  
19

**Case No.: 2:11-CV-1832-JCM-NJK**

**STIPULATION AND ORDER TO STAY**  
**ALL PROCEEDINGS**

20 Plaintiff, FRANK COHN, and defendants, RITZ TRANSPORTATION, INC., AWG  
21 AMBASSADOR, LLC, ALAN WAXLER, and RAYMOND CHENOWETH, through their  
22 respective counsel, hereby submit this stipulation and request a stay of all proceedings in this  
23 matter until May 1, 2013. Such stipulation is based upon the following:

24 1. Over the course of the last several months, the parties have engaged in a  
25 thorough exchange of relevant information.

26 2. Such exchange of information have led the parties to this point in which they  
27 believe they can now engage in meaningful settlement discussions.

28 3. The parties are optimistic that such settlement discussions will prove to be

1 successful.

2 4. In light of the foregoing, the parties request the Court stay all proceedings in this  
3 matter until **May 1, 2013**. This constitutes a 61 day stay and the parties believe such time is  
4 warranted to formulate a full resolution of all claims in this case.

5 6. This is the parties' first request for a stay, is made in good faith, and not made  
6 for the purpose of delay.

7  
8 Submitted this 5<sup>th</sup> day of March, 2013 by:

9  
10 DANA SNIEGOCKI  
11 Leon Greenberg Professional  
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12 By: /s/ Dana Sniegocki  
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17  
18 **IT IS SO ORDERED:**

19   
20 UNITED STATES DISTRICT/  
21 MAGISTRATE JUDGE

March 6, 2013

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DATED